

## REMARKS

The Office Action of September 16, 2005 has been received and its contents carefully considered.

Section 2 of the Office Action rejects claims 1-7 for indefiniteness, on the ground that the statutory class of invention (process, machine, manufacture, or composition of matter) to which the rejected claims are directed cannot be clearly determined. In reply, it is noted that the electronic settlement system of the rejected claims is best characterized as an electronic machine. In order to avoid any confusion on this score, the present Amendment revises claim 1 by placing the various units that are recited in the body of the claim in clearly means-plus-function form, thereby signaling that claim 1 is an apparatus claim. The present Amendment also revises the dependent claims to conform them to the new wording of claim 1. In view of these changes, it is respectfully submitted that the rejection should be withdrawn.

The Office Action rejects the claims for obviousness on substantially the same grounds that they were rejected in the previous Office Action, dated March 16, 2005. Section 6 of the present Office Action indicates that the prior arguments have been held in abeyance pending a response to the rejection under the second paragraph of 35 USC 112. In view of the present Amendment, it is respectfully submitted that Applicants' arguments for patentability over the prior art should now be considered. For the sake

of completeness, these arguments are repeated below (slightly modified, where appropriate, in view of the new claim language).

The Office Action rejects independent claim 1 (and several dependent claims) for obviousness on the basis of U.S. patent 6,793,135 to Ryoo. For the reasons discussed below, however, it is respectfully submitted that the invention now defined by claim 1 would not have been obvious, to an ordinarily skilled person, from the Ryoo reference.

The Office Action draws attention to Ryoo's Figure 2, and notes the settlement server 150 and the prepaid calling card system 140 that are shown in this figure. The Ryoo reference explains Figure 2 in the passage from the middle of column 3 to the top of column 4. Basically, the arrangement shown in Ryoo's Figure 2 permits a person to purchase a "virtual prepaid card" over the internet and then use it to make purchases.

In Ryoo's arrangement, a purchaser must buy prepaid money beforehand, so that it will be available when the person selects what to buy. From the point of view of a virtual shop, this risks the possibility of a lost sale. For example, an online shopper without prepaid electronic money might wade through a number of websites and menus at the websites before finding what he wants to buy, only to discover that he must now leave the website having the merchandise he wants to buy in order to go elsewhere and purchase prepaid electronic money first. Will the potential customer find his way back? Will the potential customer become distracted after buying the prepaid electronic money, and resume his online shopping?

Either case risks the loss sale for the virtual shop with the merchandise that the shopper was previously prepared to buy.

The system disclosed in the present application avoids losing sales in this way. According to the present invention, an online shopper who has found a virtual shop with goods or services that the shopper wants to buy receives help from the virtual shop in buying the prepaid electronic money needed to make the purchase.

Claim 1 is directed to a system that allows a purchaser using a terminal to pay for a purchase from a virtual shop. The claim recites “a paying method presenting unit means for receiving a verification from said terminal that said purchaser would like to make the purchase, sending a message to said terminal directing said purchaser to pay using prepaid electronic money ..., and if said purchaser does not already own prepaid electronic money, sending an inquiry to said terminal asking whether said purchaser would like to buy a set amount of prepaid electronic money over said network.” This is neither disclosed nor suggested by Ryoo.

Claim 1 also recites “an electronic money purchasing unit means for receiving an instruction to buy said prepaid electronic money from said purchaser via said terminal, purchasing said set amount of prepaid electronic money over said network on behalf of said purchaser ... and notifying said purchaser of an identification number ... and reporting a balance remaining after payment for the purchase is subtracted from said

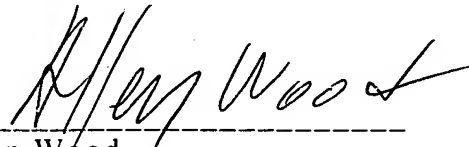
set amount of prepaid electronic money.” This is neither disclosed nor suggested by the reference, either.

Independent claim 8 recites “a paying method presenting step” and an “electronic money purchasing step” which correspond generally to the “paying method presenting unit means” and the “electronic money purchasing unit means” of claim 1. It is therefore respectfully submitted that claim 8 is patentable over Ryoo for reasons along the lines discussed above with respect to claim 1.

Claims 2-7 depend (directly or indirectly) from claim 1 and recite additional limitations to further define the invention. Accordingly, they are patentable along with claim 1 and need not be further discussed.

For the foregoing reasons, it is respectfully submitted that this application is now in condition for allowance. Reconsideration of the application is therefore respectfully requested. Reconsideration of the application is therefore respectfully requested.

Respectfully submitted,



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